



1 **DREW J. RIBAR**

2 **3480 Pershing Ln.**

3 **Washoe Valley, NV 89704**

4 **(775) 223-7899**

5 **Const2Audit@gmail.com**

6 **Pro Se Plaintiff**

7
8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 **NORTHERN DIVISION**

12
13
14 **DREW J. RIBAR,**

15 **Plaintiff,**

16
17
18 **v.**

19 **WASHOE COUNTY; BUILD OUR CENTER, INC.; et al.,**

20 **Defendants.**

21
22
23 **Case No.: 3:24-cv-00526-ART-CLB**

24 **Dept. No.: II**

25
26 **PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

27
28 **PLEADING TITLE - 1**

1 (AND TO FILE EXHIBITS UNDER SEPARATE COVER AND MANUAL
2 SUBMISSION)
3

4 ORAL ARGUMENT REQUESTED
5
6

7
8 TO THE HONORABLE COURT AND ALL COUNSEL OF RECORD:
9

10 Plaintiff, ****Drew J. Ribar****, appearing pro se, respectfully moves this Court pursuant to
11 ****Federal Rule of Civil Procedure 15(a)(2)****, ****Local Rule LR 15-1****, and ****this Court's**
12 **Civil Standing Order****, for leave to file the attached ****First Amended Complaint****.
13
14

15 **### I. LEGAL STANDARD**
16
17

18 Rule 15(a)(2) of the Federal Rules of Civil Procedure provides that “a party may amend its
19 pleading only with the opposing party’s written consent or the court’s leave. The court
20 should freely give leave when justice so requires.”

21 See also **Foman v. Davis**, 371 U.S. 178, 182 (1962) (leave should be freely granted absent
22 bad faith, undue delay, or prejudice).
23
24

25 Under Ninth Circuit precedent, leave to amend should be granted with “extreme
26 liberality.” **C.F. ex rel. Farnan v. Capistrano Unified Sch. Dist.**, 654 F.3d 975, 985 (9th
27 Cir. 2011).
28

PLEADING TITLE - 2

II. GOOD CAUSE FOR AMENDMENT

This motion is made in good faith and supported by the following:

- 1. **Court Order**: On March 13, 2025, the Court granted Defendant's Motion for a More Definite Statement under **FRCP 12(e)**. This amended complaint responds directly to the Court's order by clearly articulating Plaintiff's factual and legal claims.**
- 2. **Clarification of Issues**: The proposed **First Amended Complaint** (attached) sets forth 11 causes of action and is supported by 32 exhibits. It clarifies the timeline of alleged constitutional violations, names all responsible individuals with particularity, and cites controlling case law.**
- 3. **No Prejudice to Defendants**: Discovery is still ongoing, and no trial date has been set. Allowing this amendment will not prejudice Defendants and will promote judicial efficiency by streamlining the issues for resolution.**
- 4. **Supplemental Evidence**: Since the filing of the original Complaint on **November 20, 2024**, Plaintiff has compiled significant evidence in support of the claims. This includes both document and video evidence (Exhibits 1–32), including new materials that were not available at the time of the original filing.**

1 **5. **Compliance with Local and Standing Rules**:** This motion is submitted in full
2 compliance with ****LR 15-1(a)**** and ****Judge Denney's Civil Standing Order (Section**
3 **IV.B)****, and is accompanied by:

- 4 - A clean version of the proposed ****First Amended Complaint**** (attached),
- 5 - A ****redlined version**** showing changes from the original complaint (Exhibit A),
- 6 - A ****Notice of Manual Filing**** for video exhibits,
- 7 - A separate filing of 32 exhibits with indexed Bates numbers.

8
9
10 **### III. REQUEST FOR MANUAL FILING OF VIDEO EXHIBITS**

11
12
13 Plaintiff respectfully requests permission to manually file ****video exhibits**** numbered 27–
14 32 via USB or DVD pursuant to ****LR IC 2-1(f)****, as these exhibits cannot be electronically
15 uploaded to CM/ECF.

16
17
18 **### IV. PRAYER FOR RELIEF**

19
20 For the reasons above, Plaintiff respectfully requests:

- 21 1. That the Court grant leave to file the attached ****First Amended Complaint****;
- 22 2. That the accompanying ****Exhibits 1–32**** be accepted as part of the amended pleading;
- 23 3. That manual filing of ****video Exhibits 27–32**** be approved;
- 24 4. That the Court deem the amended complaint the operative pleading.

1 DATED this 25th day of March, 2025.

2
3 Respectfully submitted,

4 /s/ Drew J. Ribar

5
6 **DREW J. RIBAR**

7 Plaintiff, Pro Se

8 3480 Pershing Ln

9 Washoe Valley, NV 89704

10 Const2Audit@gmail.com

11
12 (775) 223-7899

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28 PLEADING TITLE - 5